



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP/ALC/LHE/SME
F. #2016R00505

*271 Cadman Plaza East
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March 27, 2017

By ECF and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

As discussed at today's status conference in the above-captioned case, enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which was previously produced by the government on January 12, 2017 to counsel for defendants Joseph SanFilippo, Daniel Small and Jeffrey Shulse, respectively. This disclosure also supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017 and March 9, 2017. The government again requests reciprocal discovery from the defendants.

Defense Counsel
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Enclosed please find copies of the following documents:

- A report and corresponding notes that contain a summary of defendant Joseph SanFilippo's statements to the government on July 12, 2016 (Bates stamped EDNY-PP-JSF-000000001 to EDNY-PP-JSF-000000047);
- A report and corresponding notes that contain a summary of defendant Jeffrey Shulse's statements to the government on June 20, 2016 (Bates stamped EDNY-PP-JS-000000001 to EDNY-PP-JS-000000024); and a report and corresponding notes that contain a summary of defendant Shulse's statements to the government on July 26, 2016 (Bates stamped EDNY-PP-JS-000000025 to EDNY-PP-JS-000000094); and
- A report and corresponding notes that contain a summary of defendant Daniel Small's statements to federal agents on June 8, 2016 (Bates stamped EDNY-PP-DS-000000001 to EDNY-PP-DS-000000017); and a report and corresponding notes that contain a summary of defendant Small's statements to the government on June 21, 2016, and two related email exhibits (Bates stamped EDNY-PP-DS-000000018 to EDNY-PP-DS-000000061).

Very truly yours,

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cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)